

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Michael S. Blume, AUSA  
U.S. Attorney's Office, 615 Chestnut St., Suite 1250, Philadelphia, PA 19106  
(215) 861-8376

**DEFENDANTS**

DeMARCO REI, INC.,  
OPM GROUP, LLC, and  
ANTHONY J. DeMARCO, III

County of Residence of First Listed Defendant Eastern District of PA  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation ☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Anti-Fraud Injunction Statute, 18 U.S.C. § 1345

Brief description of cause:

Injunctive relief to help victims of a mail fraud scheme.

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

Baylson

DOCKET NUMBER

10-CR-790

DATE 12/14/2010 SIGNATURE OF ATTORNEY OF RECORD



FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

**FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM** to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: c/o United States Attorney's Office, Eastern District of Pennsylvania, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106

Address of Defendant: 1500 John F. Kennedy Blvd., Suite 222, Philadelphia, PA 19102

Place of Accident, Incident or Transaction: Eastern District of Pennsylvania

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: 10-CR-790 Judge Baylson Date Terminated: N/A - Not Terminated

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☒ No ☐
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☒ No ☐
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) Anti-Fraud Injunction Statute, 18 U.S.C. § 1345

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases  
(Please specify)

**ARBITRATION CERTIFICATION**

(Check Appropriate Category)

I, Michael S. Blume, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought.

DATE: 12/14/2010

Michael S. Blume, Assistant U.S. Attorney

78525 PA

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 12/14/2010

Michael S. Blume, Assistant U.S. Attorney

78525 PA

Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

UNITED STATES OF AMERICA	:	CIVIL ACTION
v.	:	
DeMARCO REI, INC.,	:	
OPM GROUP, LLC, and	:	
ANTHONY J. DeMARCO, III	:	NO. 10-

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ( )
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

12/14/2010  
Date

  
Michael S. Blume, AUSA

United States of America  
Attorney for

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(Civ. 660) 10/02

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>No. 10-</b>
	:	
<b>DeMARCO REI, INC.,</b>	:	
<b>OPM GROUP, LLC, and</b>	:	
<b>ANTHONY J. DeMARCO, III</b>	:	

**VERIFIED COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

The United States of America, by its attorneys, Zane David Memeger, United States Attorney, and Assistant United States Attorneys Michael S. Blume and Stacey L. B. Smith, brings this civil action under the Anti-Fraud Injunction Statute, 18 U.S.C. § 1345. In support of its Verified Complaint, the United States respectfully alleges as follows:

1. This is a civil action brought by the United States to enjoin defendants DeMarco REI, Inc., OPM Group, LLC, and Anthony J. DeMarco, III, from committing further mail fraud and banking law violations, in connection with a home foreclosure rescue scam; prevent the disposition of property obtained as a result of the defendants' banking law violations; and take other necessary actions to prevent continuing and substantial injury to victims of the fraud.

2. The defendants are real estate companies and its principal that purported to help homeowners in danger of losing their homes to foreclosure. The defendants would scour public records filings to find individuals in financial distress. They would then approach these individuals and pitch a solution. The pitch – a “sale-leaseback” arrangement – was that the real estate company would buy the homeowner's house. The homeowner would remain in the house, but pay rent to the real estate company. When the homeowner got back on his or her feet financially, the homeowner could re-purchase the house.

3. In fact, the pitch and the sale-leaseback arrangement were a fraud. If a homeowner agreed to the arrangement, he or she would sell the house to a “straw” party, not the real estate company. The financial documents supporting that sale and the mortgage obtained to finance the sale were often, if not invariably, doctored. The real estate company would forge signatures, create falsified employment and income verification documents, misrepresent the flow of cash, and misstate material facts on loan applications. After the sale, the real estate company would mishandle rental payments. Homeowners – now renting from the “straw” parties – would mail their rent payments to the real estate company. The real estate company generally would not, however, use the rental payments to make the monthly payments on the mortgages on the houses. Instead, the principal of the real estate company would siphon off the funds from the rental payments and use those funds for his own purposes. As the mortgages fell into default, the real estate company would then mislead the lending companies as to the reasons for those defaults in an attempt to satisfy the mortgages on favorable terms and to keep the fraudulent scheme alive.

4. The defendants entered into approximately 120 sale-leaseback arrangements. The bulk of the 120 properties are in New Jersey and Pennsylvania. Other properties are located in California, Connecticut, Florida, Illinois, Indiana, Maryland, and Maine. Many of the properties have already been foreclosed upon, but all of the remaining properties are in danger of foreclosure. The victims of the fraud are in danger of losing their homes.

5. The United States seeks relief that will extend beyond the parties to reach the homeowners, the “straw” purchasers, and the mortgage lenders. One purpose of the action is to bring all the individuals and entities that have a stake in the properties before the Court to create

an orderly process by which the damage caused by the defendants' fraud can be mitigated. That process, sanctioned by the applicable statutes, will mean that non-party, non-defendants should be enjoined from engaging in any transactions that will affect the properties at issue here.

### **JURISDICTION AND VENUE**

6. This Complaint is brought by the United States for a temporary restraining order and preliminary injunction and other equitable relief pursuant to 18 U.S.C. § 1345. The action is brought to enjoin fraud and the disposition of illegally obtained property based upon probable cause of violations of the federal mail fraud statute (18 U.S.C. § 1341), which violations affect financial institutions and continue to harm individuals. The United States seeks to enjoin the defendants, the "straw" parties, and the relevant mortgagees, from selling, transferring, encumbering, impairing, alienating or otherwise disposing of, in any manner, the properties listed in Exhibit A. The United States also seeks to prevent the defendants, their agents, officers, and employees, and all persons in active concert or participation with them from committing further mail fraud and banking law violations and, seeks any other action the Court deems necessary to prevent a continuing and substantial injury to the victims of the fraud.

7. The Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

8. The Court has personal jurisdiction over the defendants and venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and 1391(c) as all the defendants either reside in this District or did business in this District, and defendants' actions that gave rise to this complaint all occurred in this District.

### **PARTIES**

9. Plaintiff is the United States of America.

10. Defendant DeMarco REI, Inc. is a Pennsylvania corporation with a principal place of business at 1500 J.F.K. Boulevard, Suite 222, Philadelphia, PA 19102.

11. Defendant OPM Group, LLC is a business entity with a principal place of business at 640 Freedom Road, Suite 201, King of Prussia, PA 19406.

12. Defendant Anthony J. DeMarco, III, is currently a Pennsylvania resident. While for some time DeMarco was a New Jersey resident, during most of the time that the events described in the Verified Complaint occurred, DeMarco was a resident of Pennsylvania, living in this District. He founded DeMarco REI and was its President and Chief Executive Officer. DeMarco also founded OPM Group, LLC and is its principal.

### **FACTUAL BACKGROUND**

#### **The Fraudulent Scheme**

13. The fraud at issue began at DeMarco REI, Inc. (hereafter "DeMarco REI").

14. Anthony J. DeMarco, III (hereafter "DeMarco") founded DeMarco REI in 2006.

The company sold itself as able to help homeowners in financial distress save their homes.

15. Employees of DeMarco REI found potential clients by examining public records. From these public records, the employees could identify properties that were subject to mortgage foreclosure actions. The employees would then contact the owners of these properties, by telephone or through the mails, to offer DeMarco REI's services.

16. The employees would explain DeMarco REI's services to potential clients as follows. DeMarco REI would purchase the house from the homeowner, thereby paying off the

outstanding mortgage. The homeowner would stay in the house, but pay rent to DeMarco REI. After a year, the homeowner could purchase the house back from DeMarco REI. If there was equity in the house at the time of the sale – that is, if the value of the house exceeded the outstanding principal on the mortgage – DeMarco REI would put that money into escrow for the homeowner, either to use as rental payments if necessary or to return to the homeowner at the time of the re-purchase. The DeMarco REI company line held that 20-25% of the homeowners who worked with the company bought their homes back.

17. The sales pitch outlined above was not true. The actual transactions that DeMarco REI would conduct were very different from the pitched transactions.

18. First, DeMarco REI did not purchase the house from the homeowner. Rather, DeMarco REI recruited people who could act as straw purchasers of the houses. The company advertised in various newspapers, touting a real estate investment opportunity. Individuals who responded were told that they would be helping out homeowners in financial distress. The investors would let DeMarco REI use their good credit to obtain mortgages to buy the houses from these homeowners. The homeowners would stay in the houses and pay rent to DeMarco REI, which, in turn, would pay for the mortgages. It was the investors, not DeMarco REI, who now owned the houses of the DeMarco REI clients. For their trouble, the investors would get a fee – sometimes \$5,000, sometimes \$7,500 – from DeMarco REI for each transaction.

19. Second, the sales transactions – from the homeowner to the investor – were riddled with fraudulent documents. As matter of course, DeMarco REI employees falsified the documents associated with the sales transactions. It was routine for the employees to engage in the following fraud:



a. DeMarco REI employees filled out mortgage loan applications using false income and employment information and submitted those applications to lenders for loans to finance the sales from the homeowners to the investors.

b. To support the false income and employment information on the loan applications, DeMarco REI employees created false verification documents (e.g., pay stubs, bank statements, investment account statements) on company computers. These false documents were also submitted to lenders.

c. DeMarco REI employees commonly forged the signatures of homeowners and investors alike on real estate and mortgage transaction documents. They used a clever system of placing two strips of Scotch tape over a legitimate signature, tracing the signature, removing the top strip, applying that strip to a separate document, and photocopying the document.

d. DeMarco REI employees hid from lenders the fact that the investors were purchasing multiple houses, a risky venture. An investor typically acted as a straw purchaser of several houses. The DeMarco REI employees made sure that, when an investor bought more than one house, the several transactions all occurred within a very short time frame. That way, the DeMarco REI employees could falsely tell each lender that the investor was only purchasing one house – a less risky proposition – without the lenders learning of the other purchases. The close together transactions would not appear in public records in time for lenders to learn of them during their due diligence.

e. DeMarco REI employees prepared paper work purporting to show that the investors brought cash to the real estate closings. Bringing cash to the real estate closings was a

necessary element of any mortgage loan because the lenders wanted to ensure, in part, that the borrowers had the financial ability to repay the loans. The investors, in fact, put no money into the deals at all. To the contrary, they got money out of the deals.

f. DeMarco REI employees prepared fake leases to include in the loan application packages. Aware that the house purchases were for investment purposes, the lenders wanted to know whether the houses would generate income, thereby making it more likely that the borrowers would be able to repay the loans. DeMarco REI employees therefore created fake leases, using fake names for the renters (but actual property addresses – of former residences of friends or family, or of residences the employees found on the internet). The employees then submitted those fake leases to the lenders to support the loan applications.

20. Lenders relied on the false information DeMarco REI employees provided to them. They therefore issued mortgage loans that they otherwise would not have issued, had they known the truth about the transactions.

21. Third, DeMarco REI misused rental payments. As homeowners made the rental payments – by mail or in person – DeMarco REI deposited them in a company bank account. That money was meant to pay the mortgages on the loans that financed the sale of the houses from the homeowners to the investors. Rather than making the monthly mortgage payments, however, DeMarco REI used the money from the rental payments for other purposes. For example, the money paid for DeMarco's lavish lifestyle, which included a high-end apartment and luxury cars.

22. Fourth, DeMarco REI never created any escrow accounts for the homeowners. To the extent that the sales transaction from the homeowner to the investor yielded equity – that is,

to the extent the sale price exceeded any outstanding loan balance – the excess money went into a DeMarco REI company bank account. That money was not held in escrow or segregated in any way. Instead, that money was used to pay for DeMarco's lavish lifestyle.

23. Fifth, no homeowner re-purchased his or her house from DeMarco REI. Contrary to the company's sales pitch, there was not a 20-25% success rate for the company's clients. In fact, not a single client was able to re-purchase his or her house.

24. One family – M.S. and L.S. – did acquire the wherewithal to re-purchase their house, but DeMarco victimized them even further. The family obtained a large cash settlement in connection with litigation. The family wanted to use some of the settlement proceeds to re-purchase their house from DeMarco REI. They contacted DeMarco himself, who advised them to wire the money to him at a special bank account. The family believed that, by doing so, they would pay off whatever debt they may have owed and that they would have their house returned to them. They wired the money, as DeMarco instructed. DeMarco withdrew the money, went to a luxury sports car dealer, and purchased a Ferrari for himself. He did not pay off any debt the family owed; he did not return their house to them. DeMarco has since sold the car and dissipated the assets.

25. DeMarco himself conceived of the sale-leaseback arrangements. DeMarco also directed DeMarco REI employees to engage in the fraudulent conduct described herein.

#### **The Affected Properties**

26. DeMarco REI engineered approximately 120 sale-leaseback transactions. Upon information and belief, Exhibit A contains a comprehensive list of those transactions. Exhibit A is incorporated herein as if fully set forth. Exhibit A identifies the transaction by property

address, original homeowner, “straw purchaser” or investor name, lender, lender account number, and lender address. All of the lenders are financial institutions as defined by 18 U.S.C. § 20.

27. All of the loans identified on Exhibit A are in danger of foreclosure. In several instances, lenders have already instituted foreclosure proceedings on the loans.

#### **Examples of DeMarco REI Transactions**

28. A description of five DeMarco REI transactions will serve to illustrate the fraudulent scheme that victimized – and is continuing to victimize – homeowners.

a. A.B., who lived on Garden Lane in Bensalem, Pennsylvania, fell behind on his mortgage. A.B. is a trucker and mechanic who has faced some employment difficulties in recent years, having been laid off, rehired, then laid off again from one of the two jobs he works. He got a telephone call from a DeMarco REI employee who told A.B. that DeMarco REI could help him save his house. DeMarco REI arranged for A.B. to sell his house to S.R. in December 2008. For his trouble, S.R. got paid \$4,000 from DeMarco REI. The sale from A.B. to S.R. would pay off the mortgage on A.B.’s house. A.B. would then rent the house from S.R. until A.B. could afford to purchase the house back. American Partners Bank, an affiliate of Waterfield Bank, provided the financing to S.R. to purchase the house. S.R. was unemployed at the time of the purchase; he had just lost his job. DeMarco REI took care of that problem by drafting a letter stating that S.R. worked for DeMarco REI earning a salary plus commission. DeMarco REI also told the lender, on the telephone, that S.R. worked at the company. And, DeMarco REI created a pay stub showing S.R.’s income from the company. None of it was true; S.R. never worked for DeMarco REI. At the time of the sale from A.B. to S.R., there was over \$100,000 in equity in

the house. DeMarco REI employees told A.B. that the company would create an escrow for A.B. to hold that equity. That escrow never existed. All of the equity in the house went to DeMarco; none went to A.B. A.B. lived in the house about a year after the sale to S.R.; he paid rent to DeMarco REI to do so. A.B. did fall behind on his rent and, in late 2009, S.R. evicted A.B. from his home.

b. P.H. is a school bus driver who lives on Glasgow Street in Stowe, Pennsylvania. She lives with her daughter, son-in-law, and grandson. She did not have a mortgage on her house. A few years ago, P.H. suffered some medical problems. Bills began to mount and she realized that she needed money to pay her creditors. DeMarco REI employees called her and told her the company could help. She needed about \$40,000. Rather than re-financing the house – on which there was no mortgage – DeMarco REI arranged to sell the house from P.H. to M.B. P.H. did not understand that DeMarco REI had arranged to sell her house. Not until after she had signed all the papers did she realize that she had sold her house and that she was now a tenant. Flagstar Bank provided the financing used for the sale from P.H. to M.B. Loan paperwork stated that M.B. put up \$54,000 to purchase the house and that he was going to live in the house as his primary residence. M.B. put no money into the house; rather, DeMarco REI paid him \$4,000. And, he had no intention of ever living in the house; rather, it was to be rented to P.H. P.H. paid rent on her house by sending money to DeMarco REI. But, the mortgage payments somehow fell behind. The mortgage is now in default.

c. T.P. lived on 36th Avenue in Monroeville, New Jersey with her husband. T.P. lived in the house her entire life; she inherited it from her godmother. The deed to the house transferred to T.P. when she turned 21 in 2007. To pay for family bills, T.P. and her husband

took out a mortgage on the house and then re-financed that mortgage. When T.P.'s husband was laid off from his job, the family fell behind on their mortgage payments. The lender began foreclosure proceedings. A DeMarco REI employee then called. He said that the company could arrange to sell their house to an investor and T.P. and her husband could stay in the house, pay rent, and then buy it back when they could afford to do so. DeMarco REI arranged to sell the house to S.R. DeMarco REI paid S.R. \$4,000 for his role in the transaction. A loan from Freedom Mortgage financed the transaction. The mortgage loan application papers state that S.R. worked for DeMarco REI and that he had over \$200,000 in a bank account. S.R. neither worked for DeMarco REI nor ever had close to \$200,000 in any bank account. The application papers also stated that S.R. was going to purchase the house as an investment and lease it to R.J. The paper work even included a false lease from S.R. to R.J. meant to hide from the lender the fact that T.P. was going to stay in the house. With the equity from the house, DeMarco REI was to maintain a reserve for T.P. The company did no such thing. What is more, the settlement statement from the transaction indicated that S.R. brought over \$50,000 to the closing and that T.P. received over \$75,000. Neither happened. Instead, the \$75,000 went to DeMarco REI, a fact not disclosed to the mortgage lender. T.P. paid rent to DeMarco REI each month.

d. S.W. lives on Tioga Street in Philadelphia. S.W. inherited the house from her grandmother. Putting a mortgage on the house, S.W. borrowed money to pay back taxes and accumulated debt. By late 2008, she was in financial distress, was unable to pay the mortgage, and was facing foreclosure. Her husband received a letter in the mail from DeMarco REI claiming that the company could help to save the house. S.W. agreed to the plan DeMarco REI suggested. She would sell the house – which would pay off the existing mortgage – and rent it

from the new owner. Once she could afford to purchase the house, she could buy it back. In the transaction, S.W. sold the house to J.G. Although the settlement statement provided to the lender indicated that J.G. brought over \$12,000 to the closing, J.G. did not put any money into the deal. Instead, she received \$4,000 from DeMarco REI for her role in the transaction. AmTrust Bank provided the mortgage to finance the sale from S.W. to J.G. There was equity in the house of over \$20,000. DeMarco REI promised that the equity would be held in reserve for S.W. On at least one occasion, S.W. asked for some of that money to help her pay her debts. DeMarco REI refused. S.W. began paying rent to DeMarco REI. She was current on her payments. Somehow, however, the mortgage on the property fell into default.

e. J.J. lives on Woodbine Road in Havertown, Pennsylvania. Laid off from his job and suffering from a back injury, J.J. fell behind on his mortgage. He faced foreclosure. A lawyer referred him to DeMarco REI. DeMarco REI would arrange to sell J.J.'s house. The sale would pay off the mortgage. J.J. could remain in the house and would pay rent. When J.J. got back on his feet financially, he could re-purchase the house. J.J. believed that DeMarco REI was going to purchase his house; in fact, D.V. was the buyer. Superior Home Mortgage provided the financing for D.V. to buy the house. The loan application papers stated that D.V. would live in the house as his primary residence. That statement was, of course, false. According to the settlement statement, D.V. brought over \$25,000 to the closing and J.J. received over \$74,000 – the equity in the house. Neither actually happened. In fact, the equity went right to DeMarco REI. And, the money that was supposed to come from D.V. actually came from DeMarco REI. After the sale, J.J. began to make rental payments to DeMarco REI. He continued those payments monthly, but J.J. soon learned that the mortgage on the house was again in foreclosure.

The mortgage is now held by Wells Fargo.

**Involvement of OPM Group, LLC**

29. Because of a dispute between DeMarco and his wife, B.T., in July 2009, DeMarco renounced any association he had with DeMarco REI. Upon information and belief, DeMarco REI's operations have ceased.

30. DeMarco then formed a new company, OPM Group, LLC (hereafter "OPM"). He recruited several former DeMarco REI employees to work with him at OPM.

31. Throughout 2009 and up until at least January 4, 2010, OPM employees, including DeMarco himself, contacted DeMarco REI clients by telephone and e-mail. OPM employees told these clients to mail their rental payments to OPM, rather than to DeMarco REI.

32. OPM managed a number of the properties involved in the fraud. DeMarco directed that "management," such as it was. OPM collected rental payments from the original homeowners of several of the properties listed on Exhibit A, but did not pay the mortgages on those properties, however. OPM took steps to attempt to evict original homeowners from several of the properties listed on Exhibit A. OPM also took steps to attempt to sell several of the properties listed on Exhibit A.

33. An example of one of the properties OPM managed is the house on Eastern Parkway in Irvington, New Jersey. L.S. owned the house in 2007 when she fell on financial hard times. Her mortgage was in default. That was when DeMarco REI contacted her. As with many other transactions it has conducted, DeMarco REI structured a sale of L.S.'s house to a "straw" purchaser, S.A. The sale occurred in September 2007. DeMarco REI took \$83,742.55 from the sale as a "fee." That money was L.S.'s equity in the house. L.S. continued to live in the house



and paid monthly rent. She paid that rent to DeMarco REI. Then, when DeMarco REI went out of business, L.S. began to send rental payments to OPM. Her most recent rental payment to OPM was in October 2009. She still pays rent, but does so into an escrow account. DeMarco himself has been in contact with L.S., promising that he can help her get her house back. The mortgage loan used to finance the 2007 sale is in foreclosure, and the current owner of the house, S.A.'s son, had been seeking to evict L.S.

34. OPM also engaged in transactions structured just like those of DeMarco REI. An example involves G.C. G.C. lives on Primrose Avenue in Philadelphia. She bought her home from the builder in 1959. G.C. and her husband raised four children in the house, one of whom still lives with her. She is retired; her husband passed away in 2000. As of 2005, the house was free and clear of any mortgages. G.C. needed some money; so she took out a loan. In recent years, because of medical problems and the bills associated with her care, G.C. fell behind on the mortgage. She received a foreclosure notice. That was when DeMarco contacted her, in August 2009. DeMarco told G.C. that he could help her avoid foreclosure. What she did not understand, was that she was about to sell her house to a "straw" purchaser, and then rent it back. The sale transaction closed in September 2009. In that sale, G.C. sold the house to J.M. The considerable equity from the house went straight to OPM. OPM received \$97,000. She was required to pay rent of \$1,000 to live in her home. As late as the week of January 4, 2010, a representative of OPM called G.C. and told her to mail those payments to OPM at an address in Philadelphia. G.C. has since passed away. Her family, which stood to inherit the property, is attempting to resolve her affairs. The property is due to be sold at Sheriff's Sale imminently.

**The Effect of the Fraud Is Ongoing, and the Properties Are Being Disposed Of**

35. Because most, if not all, of the mortgages on the properties listed on Exhibit A are in default, several of the mortgage lenders are instituting foreclosure actions. The actions would result in forcing the original homeowners out of their homes. For example, Sheriff's Sales had and have been scheduled for September, October, November, and December, 2010. The United States has been attempting to keep those sales from occurring.

36. Several of the investors, in attempts to remove themselves from the fraud, are attempting to sell or otherwise dispose of the properties that are in their names. In so doing, several of the investors are moving to evict the original homeowners from their homes.

**COUNT I (INJUNCTIVE RELIEF)**

18 U.S.C. § 1345

37. The United States realleges and incorporates by reference herein the preceding paragraphs of this Complaint as though fully set forth herein.

38. Among other illegal actions, the defendants violated 18 U.S.C. § 1341 by committing mail fraud by executing a scheme or artifice to defraud or for obtaining money or property by means of false or fraudulent pretenses, with the intent to defraud, and, in so doing, used the United States mails and/or a private or commercial interstate carrier.

39. The mail fraud committed by the defendants affected a financial institution, as "financial institution" is defined in 18 U.S.C. § 20.

40. The mail fraud committed by the defendants is a banking law violation as defined by 18 U.S.C. § 3322(d).

41. The United States seeks, pursuant to 18 U.S.C. § 1345(a)(2), a temporary

restraining order and injunction that bars the defendants, their agents, officers, and employees, all persons in active concert or participation with them, and all persons and entities receiving notice of the injunction, from alienating, withdrawing, transferring, removing, dissipating, or disposing of any property obtained as a result of the defendants' banking law violations without prior approval of the Court.

42. The United States also seeks, pursuant to 18 U.S.C. § 1345(b) a temporary restraining order and injunction restraining all future fraudulent conduct and any other action that the Court deems just in order to prevent a continuing and substantial injury to the persons and entities affected by the defendants' mail fraud, including without limitation the homeowners who entered into sale-leaseback arrangements and the lenders who provided mortgages to finance those arrangements.

#### **PRAYER FOR RELIEF**

WHEREFORE, the plaintiff United States of America prays that this Court:

Issue a Temporary Restraining Order and Preliminary Injunction in this matter enjoining the defendants and all those receiving notice of the Order and/or Injunction, including third parties to this action, as follows:

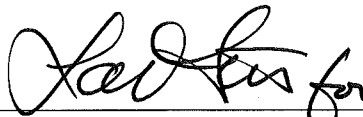
1. Prohibiting the defendants, their agents, officers, and employees, and all persons in active concert or participation with them, from committing any banking law violation as defined by 18 U.S.C. § 3322(d);
2. Prohibiting the defendants, their agents, officers, and employees, and all persons in active concert or participation with them, from making or conspiring to make any false statements to any financial institutions with respect to any real estate transaction;

3. Prohibiting the defendants, their agents, officers, and employees, and all persons in active concert or participation with them, from participating in any real estate, mortgage, or real property rental transaction except, in the case of the individual defendant, for such transactions involving the individual's personal and primary residence;

4. Prohibiting the defendants, their agents, officers, and employees, and all persons in active concert or participation with them, and all those receiving notice of any Order and/or Injunction from transferring, selling, assigning, dissipating, concealing, encumbering, impairing, or otherwise disposing of, in any manner, the properties listed on Exhibit A without prior approval of the Court;

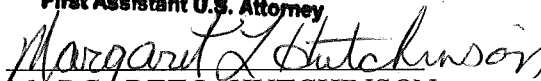
6. Ordering the defendants, their agents, officers, and employees, and all persons in active concert or participation with them, and all those receiving notice of any Order and/or Injunction to preserve all business, financial, accounting, and other records concerning the operations of DeMarco REI, Inc. and OPM Group, LLC; and

7. For such other and further relief as the Court shall deem just and proper.



ZANE DAVID MEMEGER  
United States Attorney

**First Assistant U.S. Attorney**



MARGARET L. HUTCHINSON  
Chief, Civil Division



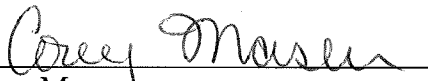
MICHAEL S. BLUME  
STACEY L. B. SMITH  
Assistant United States Attorneys  
615 Chestnut St., Suite 1250  
Philadelphia PA 19106

Dated:

12/14/10

VERIFICATION

1. I, Corey Maser, am a Special Agent of the Federal Bureau of Investigation assigned to this matter.
2. I hereby verify, under penalty of perjury, that the facts contained in the Verified Complaint for Temporary Restraining Order and Preliminary Injunction are true and correct to the best of my knowledge, and are based upon information obtained during the investigation of this matter.

  
Corey Maser  
Special Agent  
Federal Bureau of Investigations

Dated: 12/14/10

# Exhibit A

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	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
1	10 7th Ave., Cherry Hill, NJ 08003	R.M. & N.M.	C.R.	Indymac 1010505590	OneWest Bank c/o Corporation Service Co. 2711 Centerville Road Wilmington, DE 19808
2	100 Errickson Ave., Moorestown, NJ 08057	M.S. & A.S.	S.T.	Indymac 1010810701	OneWest Bank c/o Corporation Service Co. 2711 Centerville Road Wilmington, DE 19808
3	100 Norman Ave., Roebling, NJ 08554	Estate of D.B.	E.A. & M.A.	AmTrust 1671719	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
4	103 Tecemseh Trail, Browns Mills, NJ 08015	A.D.	L.P.	Countrywide 191626811	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
5	104 36th Ave., Monroeville, NJ 07111	M.P. & T.P.	S.R.	Freedom Mortgage c/o LSC 4767471	Freedom Mortgage LoanCare Servicing Center, Inc. Attention: Legal Department 3637 Suntara Way, Suite 303 Virginia Beach, VA 23452
6	108 Washington Ave., Irvington, NJ 07111	L.B. & S.R.	G.M.	Countrywide 194043442	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
7	11 Christine Place, Washington, NJ 07882	F.D. & K.D	M.H.	Countrywide 171778042	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
8	11 Hampton Lane, Willingboro, NJ 08046	C.B. & F.B.	K.H.	Freedom Mortgage c/o LoanCare Servicing Center, Inc. 4772612	Freedom Mortgage LoanCare Servicing Center, Inc. Attention: Legal Department 3637 Suntara Way, Suite 303 Virginia Beach, VA 23452
9	11 Louis St., Perth Amboy, NJ 08861	A.V. & N.V.	T.B.	Bank of America	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
10	11 Pima Court, Randallstown, MD 21133	W.T.	J.S.	Wells Fargo 259234664	Wells Fargo Home Mortgage Attention: Legal Department 1 Home Campus MACX2401-06T Des Moines, IA 50328



	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
11	11 Ridgehurst Rd., West Orange, NJ 07052	M.L.	S.P.	Atlantic Pacific Mortgage 1015100094	CitiMortgage Attention: John James 1000 Technology Dr., MS140 O'Fallon, MO 63368
12	1101 Jenkins Parkway, Brigantine, NJ 08203	A.M.C.F.	B.T.	Countrywide 168139906 & 168139914	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
13	111 20th Street, Union City, NJ 07087	C.M.	C.R.	Taylor Bean & Whitaker 2277514	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
14	1128 Birch St., Reading, PA 19604	J.B. & E.B.	J.S.	BB&T 6991821897	BB&T Attention: John P. Harmon 301 College Street Greenville, SC 29601
15	12 Fairfax Rd., Edison, NJ 08817	B.C. & M.L.C.	B.A.	Flagstar Bank 502335601	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
16	1206 Cornell St., Vineland, NJ 08360	M.S. & C.S.	F.P.	GMAC 047-757606-0	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
17	122 Devon Rd., Somers Point, NJ 08244	B.S. & W.S.	C.R.	Countrywide 180299658	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
18	122 Eastern Pkwy., Irvington, NJ 07111	L.M.S.	S.A.	Chase 1860403319	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
19	1233 W. Tioga St., Philadelphia, PA 19140	S.W. & T.W.	J.G.	AmTrust Bank 1714396	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
20	124 South Broad Street, Penns Grove, NJ 08069	D.R.	Z.J.	GMAC 477510598	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
21	133 Center Avenue, Chesilhurst, NJ 08089	G.M.	M.L.	Countrywide 169629122	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
22	1432 Filbert St., Glassboro, NJ 08028	V.G.	J.T.	Countrywide 183707341	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
23	145 Country Club Blvd., Little Egg Harbor, NJ 08087	T.H. & D.H.	W.D.	Flagstar Bank 502318881	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
24	1473 Bond St., Hillside, NJ 07025	K.R. & M.F.	B.R.	Countrywide 175538987	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
25	15 Catawba Ave., Newfield, NJ 08344	A.M. & E.M.	W.D.	AmTrust Bank 1745384	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
26	1507 Mason Run, Pine Hill, NJ 08021	N.B.	J.O.	Countrywide 194522298	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
27	1540 Elmwood Avenue, Kissimmee, FL 34744	J.A. & S.A.	D.H.	Countrywide 130634503	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
28	16 Chicory Street, Browns Mills, NJ 08015	G.M. & T.M.	J.A.	GMAC 047-753745-0	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Servicer Contact Information</u>
29	16 Macarthur St., Spotswood, NJ 08884	M.S. & L.S.	M.B.	Specialized Loan Servicing 1002915275	Specialized Loan Servicing Attention: Legal Department P.O. Box 636005 Littleton, CO 80163-6005
30	160 Jeff Street, Edison, NJ 08837	D.D-H.	C.R.	Countrywide 188255908	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
31	161 New York Ave., Jersey City, NJ 07307	F.V.	EA. & M.A.	GMAC 047-757434-7	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
32	165 Watchung Place, Nutley, NJ 07110	A.D.	J.O.	Flagstar Bank 502216872	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
33	17 Shawnee Trail, Sparta, NJ 07871	T.D.	C.R.	Bank of America 6416936075	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
34	1766 45th St., Pennsauken, NJ 08110	R.H.	S.R.	Citi AOT 00-1120446499	CitiMortgage Attention: John James 1000 Technology Drive MS140 O'Fallon, MO 63368
35	18 Cypress Point Rd., Westampton, NJ 08060	A.T.	M.H.	Chase 1760708631	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
36	18 Hinsdale Lane, Willingboro, NJ 08046	A.T.	B.K.	Countrywide 159330524	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
37	18 New Street, Westville, NJ 08093	B.D.	J.T. & K.T.	Countrywide 182685087	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
38	19 East Main St., High Bridge, NJ 08829	D.R. & J.R.	S.P.	Freedom Mortgage Corp 0083168153	Freedom Mortgage LoanCare Servicing Center, Inc. Attention: Legal Department 3637 Suntara Way, Suite 303 Virginia Beach, VA 23452
39	2 Christopher Ct., Lincoln, NJ 07035	R.P.	D.P.	Flagstar Bank 502315365-2	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
40	2 South Harley Ave., Gloucester, NJ 08110	K.H.	K.H.	GMAC 0-640206542	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
41	20 Dunham Loop, Berlin, NJ 08009	J.G.	B.T.	Chase 1760724660	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
42	205 Cayuga Tr., Browns Mills, NJ 08015	S.D.	J.B.	Chase 1760726859	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
43	21 Diamond Drive, Egg Harbor Twp., NJ 08234	P.R. & G.R.	M.B.	Countrywide 179434403	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
44	211 Flack Street, Toms River, NJ 08753	R.B.	L.B.	Countrywide 183837133	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
45	2165 Arthur Pass, New Lenox, IL 60451	M.S. & M.S.	B.T.	Countrywide 141276218 (1st Mortgage) & 141276210 (2nd Mortgage)	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
46	22 N. Pearl Street, Millville, NJ 08332	T.M. & C.M.	R.H.	Chase 1760759315	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
47	220 Donna Lane, Birdsboro, PA 19508	L.M. & N.M.	G.M.	BB&T 6991822966	BB&T Attention: John P. Harmon 301 College Street Greenville, SC 29601
48	221 Pelican Court, Foster City, CA 94404	D.H.	L.T.	ASC 1158065836 (1st Mortgage)  GMAC 0-359419002 (2nd Mortgage)	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
49	225 South Melville St., Philadelphia, PA 19139	M.P.	J.O.	AmTrust Bank 1086447	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
50	23 Marjorie Way, Hamilton, NJ 08690	S.S. & D.S.	Y.K.	Chase 1860467650	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
51	2305 Catherine St., Philadelphia, PA 19146	S.C.	J.B.	Bank of America 6780803646	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
52	24 Crestmont Rd., Verona, NJ 07044	W.S.	L.T.	Countrywide 152525544	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
53	250 Center Road, Elmer, NJ 08318	C.M. & P.M.	D.H.	Chase 1760768236	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
54	26 Georgetown Blvd., Barnegat, NJ 08005	D.M.	Y.K.	Wells Fargo 0-206631772	Wells Fargo Home Mortgage Attention: Legal Department 1 Home Campus MACX2401-06T Des Moines, IA 50328
55	2620 Finlaw Ave., Pennsauken, NJ 08109	P.P.	C.R.	Taylor Bean & Whitaker 2278728	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
56	268 Montclair Ave., Vauxhall, NJ 07088	E.S. & T.S.	D.P.	GMAC (0)477620421	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
57	2715 Fries Mills Rd., Williamstown, NJ 08094	R.C. & A.C.	B.R.	Countrywide 189266625	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
58	281 Lyme Street, Hartford, CT 06114	S.J.	B.T.	AHMSI - American Home Mortgage Servicing Inc. 4001401886	American Home Mortgage Servicing, Inc. Fax: 866-795-6529
59	285 Fairview Ave., Hampton Twp., NJ 07860	V.R. & S.L.-R.	J.S.	Citimortgage 2005217484-2	CitiMortgage Attention: John James 1000 Technology Drive MS140 O'Fallon, MO 63368
60	2953 Garden Lane, Bensalem, PA 19020	A.B.	S.R.	Waterfield Bank 00000-28661	Waterfield Bank Operations and Services 18881 Von Karman, Suite 1700 Irvine, CA 92612
61	30 Francis Ave., Hamilton Twp., NJ 08629	R.S.-C. & V. S.-C.	D.H.	Chase 1760737185	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
62	303 Ardmore Ave., Trenton, NJ 08629	J.B. & J.B.	N.A.	Freedom Mortgage 00-82916750	Freedom Mortgage LoanCare Servicing Center, Inc. Attention: Legal Department 3637 Suntara Way, Suite 303 Virginia Beach, VA 23452
63	303 E. Magnolia Ave., Galloway, NJ 08205	Estate of A.A.	D.P.	Taylor Bean & Whitaker 2969091	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
64	306 Cayuga Trail, Browns Mills, NJ 08015	D.M.	J.O.	Freedom Mortgage 00- 82669110	Freedom Mortgage LoanCare Servicing Center, Inc. Attention: Legal Department 3637 Suntara Way, Suite 303 Virginia Beach, VA 23452

	<u>Subject Property</u>	<u>Original Homeowner</u>	<u>Investor/ "Straw Buyer"</u>	<u>Original Lender &amp; Account</u>	<u>Lender/Service Contact Information</u>
65	31 Deidre Drive, Egg Harbor Twp., NJ 08234	R.H. & M.E.-H.	M.B.	Bank of America 6310076382	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
66	31 Indian Hill Rd., Freehold, NJ 07728	S.R.H.	W.D.	Central Mortgage Company 5779275962	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
67	3223 E. 2160 <sup>th</sup> Ave. Montrose, IL 62445	M.C. & T.C.	G.G.	GMAC 0- 601696557	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
68	33 Jensen Ave., Fords, NJ 08863	M.J.	N.A.	AmTrust Bank 1818312	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
69	34 Clinton Ave., Clifton, NJ 07011	S.W. & E.P. & H.P.	E.C.	Countrywide 154397463 (1 <sup>st</sup> Mortgage) & 154397479 (2 <sup>nd</sup> Mortgage)	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
70	3444 Primrose Rd. Philadelphia, PA 19114	G.C.	J.M.	Oak Mtg. LLC 52128652	First Niagara Bank Legal Documents Fax: 716-838-8920
71	346 State St., Cherry Hill, NJ 08034	E.D. & A.D.	M.H.	Indymac 3002748949	OneWest Bank c/o Corporation Service Co. 2711 Centerville Road Wilmington, DE 19808
72	3520 Sunnyside Ave., Philadelphia, PA 19129	D.H.	L.P.	Wells Fargo 259290435	Wells Fargo Home Mortgage Attention: Legal Department 1 Home Campus MACX2401-06T Des Moines, IA 50328
73	36 Nevada Dr., Hazlet, NJ 07730	L.W. & J.S. & O.S.	M.L.	Countrywide 176852392	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
74	3670 Academy Rd., Philadelphia, PA 19154	J.O.	M.P.	Taylor Bean & Whitaker 2879447	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808

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75	37 Kossuth St., Newark, NJ 07105	O.M.D.	W.D.	AmTrust Bank 1745186	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
76	370 Fox Hunt Dr., Nottingham, PA 19362	C.A. & G.A.	L.T.	Countrywide 129988134	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
77	3817 N. Park Ave., Philadelphia, PA 19140	N.M.	Z.J.	AmTrust 1755340	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
78	387 Centerton Rd., Bridgeton, NJ 08302	J.S.	M.H.	GMAC 0-713270814 (1st Mortgage) and ASC 1158067415 (2nd Mortgage)	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
79	4 Blanche Drive, New Egypt, NJ 08533	M.O. & T.O.	R.A.	Chase 1760706283	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
80	4 Constellation Place Unit #106, Jersey City, NJ 07305	M.M. & C.M.	M.H.	Countrywide 158295285 (1st Mortgage) & 158295293 (2nd Mortgage)	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
81	40 Jewett Ave., Jersey City, NJ 07304	B.P.	J. B.	Countrywide 177082291	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
82	406 Princess Ave., Croyden, PA 19021	L.B.	J.O.	Amtrust Bank 1086456	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
83	435 E. Malaga Rd., Williamstown, NJ 08094	S.H. & R.H.	M.H.	Chase 1760715808	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801



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84	45 Robert St. Buxton, ME 04093	W.R. & J.R.	T. S.	Ocwen Loan Servicing 40541799	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
85	4546 N. Front St., Philadelphia, PA 19140	A.O.	K.H.	Citi Mortgage 1120512736-5	CitiMortgage Attention: John James 1000 Technology Drive MS140 O'Fallon, MO 63368
86	4601 Saint David's St., Philadelphia, PA 19127	M.A.P.	J.A. & S.A.	Taylor Bean & Whitaker 2867897	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
87	4905 Bala Court, Unit 177, Mays Landing, NJ 08021	K.M.	F.T.	Countrywide 188042896	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
88	513 West Marshall St., West Chester, PA 19380	J.B. & E.B.	L.B.	CHASE 1749417781	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
89	530 N Harrisburg Ave., Atlantic City, NJ 08401	G.N.	K.H.	AmTrust Bank 2194925	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
90	5311 22 NE Terrace, Ocala, FL 34483	J.F.	B.T.	Home Eq. Servicing 325346690 (1 <sup>st</sup> Mortgage) & 325320455 (2 <sup>nd</sup> Mortgage)	HomeEq Servicing c/o CT Corporation 818 West 7th Street Los Angeles, CA 90017
91	535 East Ave., Glenside, PA 19038	N.N.	G.M.	AmTrust Bank 7724953	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
92	56 Bennett St., Phillipsburg, NJ 08690	L.P. & C.S.	D.W.	Bank of America 6019065710	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001

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93	58 Terrace Ave. Pine Hill, NJ 08021	F.B.	C.A.	NovaStar Mortgage	Ocwen Servicing c/o Corporation Service Co. 2711 Centerville Road, Suite 400 Wilmington, DE 19808
94	5890 Route 412, Reigelsville, PA 18077	D.B. & S.B.	M.H.	Countrywide 166182624	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
95	59 Lehigh Ave., Avenel, NJ 07001	L.M.	D.H.	Indymac 3002773509	OneWest Bank c/o Corporation Service Co. 2711 Centerville Road Wilmington, DE 19808
96	5922 Christian Street, Philadelphia, PA 19143	M.L.T.	E.A. & M.A.	BB&T 6991822915	BB&T Attention: John P. Harmon 301 College Street Greenville, SC 29601
97	6016 Santa Monica Dr., Tampa, FL 33615	M.V. & J.V.	M.H.	Countrywide 171112475	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
98	610 W. Glenwood Ave., West Wildwood, NJ 08260	R.R. & D.R.	L.B.	Wachovia 0007911724-00	Wells Fargo Home Mortgage Attention: Legal Department 1 Home Campus MACX2401-06T Des Moines, IA 50328
99	65 Woodbine Ave., Havertown, PA 19083	J.J. & A.J.	D.V.	Superior Home Mortgage 610-06445	Superior Home Mortgage Attention: Legal Department 854 S. White Horse Pike Augusta Professional Center Hammonton, NJ 08037
100	664 Windsor Ave., Maple Shade, NJ 08052	K.C. & S.C.	V.T. & F.T.	Countrywide 190419481	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
101	7 Davis Drive, Bridgeton, NJ 08302	J.R.	L.P.	Flagstar Bank 502002611	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
102	7641 E 106th Ave., Crown Point, IN 46307	R.W. & N.W.	G.G.	Chase 1161367284	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801

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103	8 Stevens Road, Kendall Park, NJ 08824	C. S.-N.	L.P.	Chase 1749478334	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
104	80 St. Marys St., Wharton, NJ 07885	M.W. & D.W.	J.B.	Countrywide 168259109	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
105	801 Glasgow St., Stowe, PA 19464	P.H.	M.B.	Flagstar Bank 502300768	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
106	805 Ivydale Ave., Reistertown, MD 21136	L.A.	F.T. & V.T.	Countrywide 175381159	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
107	812 Ridge Ave., Asbury Park, NJ 07712	M.H.S.	F.P. & S.P.	Flagstar Bank 502252059	Flagstar Bank Attention: Legal Department 5151 Corporate Drive Troy, MI 48098
108	83 Park Ave., Engelwood, NJ 07631	W.H. & C.H.	M.P.	GMAC 0-477600258	GMAC Summons Department GMAC Res. Cap. Attention: Legal Staff 190-FTW-L95 1100 Virginia Drive Fort Washington, PA 19034
109	84 Azalea Circle, Jackson, NJ 08527	P.D.	S.T.	Chase 1760765351	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
110	851 Phillips Road, Warminster, PA 18974	W.G. & B.G.	J.A.	AmTrust Bank 1218404	AmTrust Bank Legal Department Attention: Sue Aukerman 1801 E. 9th Street Cleveland, OH 44114
111	9 Arnet Place, Cranford, NJ 07016	D.B.	J.B.	Citi Mortgage 2005081290-6	CitiMortgage Attention: John James 1000 Technology Drive MS140 O'Fallon, MO 63368

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112	9 Goldweber Ave., Jackson, NJ 08527	C.C.	T.B.	Bank of America 6585317206	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
113	962 Lenape Drive, Cape May, NJ 08204	E.H.	S.T.	Countrywide 176999056	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
114	9731 Chapel Rd., Philadelphia, PA 19115	A.Z.	Y.K.	Citi Mortgage 2004971726	CitiMortgage Attention: John James 1000 Technology Drive MS140 O'Fallon, MO 63368
115	99 Mount Lane, Toms River, NJ 08753	D.M. & C.M.	Y.K.	Bank of America 6880069619	Bank of America Attn: Legal & Subpoena Group 100 N. Tryon Street Charlotte, NC 28255-0001
116	Doubletree Condo, Unit 56 56 Winterberry Ct. Glassboro, NJ 08028	E.S. & L.S.	M.M.W.	Integrated Funding (Financial) Group - Langhorne, PA	Chase Court Orders & Levies Dept. 451 Florida Street Baton Rouge, LA 70801
117	271 Uxbridge Dr. Cherry Hill, NJ 08034	D.B. & J.B., L.K. & M.K.	D.M.I.	Lehman Bros. Bank	Aurora Bank 1000 N. West St., Suite 200 Wilmington, DE 19801
118	4744 West St. Whitehall, PA 18052	J.C.	J.M.	Oak Mortgage Company 010903727	First Niagara Bank Legal Documents 726 Exchange St., Suite 618 Buffalo, NY 14210
119	364 E. Mechanic St. Philadelphia, PA 19144	E.R.	C.H.	Parke Bank 2691	Parke Bank P.O. Box 40 Sewell, NJ 08080
120	5050 Germantown Ave. Philadelphia, PA 19144	E.R.	J.M.	Parke Bank 2859	Parke Bank P.O. Box 40 Sewell, NJ 08080